

**REMARKS**

Claims 1-2, 4, 7-8, 10-11, 14-19, 21-22 and 24-26 are pending in this application. By this Amendment, claims 1, 4, 7, 10-11, 14-19, 21-22 and 24-27 are amended and claims 3, 5-6, 9, 12-13, 20, 23 and 27 are cancelled without prejudice or disclaimer. Various amendments are made for clarity and are unrelated to issues of patentability.

Applicants gratefully acknowledge the courtesies extended by Examiners Patel and Gupta during the personal interview on March 29 with applicants' representative, Mr. Oren.

The substance of the interview is incorporated into the following remarks. Applicants would also like to clarify the statement made in the Interview Summary Record. During the interview, applicants discussed a difference between the claimed features and the applied reference. Applicants did not refer to this difference as a main difference as appears to be alleged. Further, the last two sentences of the substance of the interview in the Interview Summary Record are statements by the Examiners and are not statements of the applicants.

Entry of the amendments is proper under 37 C.F.R. §1.116 because the amendments: (1) place the application in condition for allowance; (2) do not raise any new issues requiring further search and/or consideration; and/or (3) place the application in better form for appeal, should an appeal be necessary. More specifically, independent claim 1 is amended to include features of dependent claim 3, independent claim 11 is amended to include features of dependent claim 13, dependent claim 14 is rewritten into independent form, independent claim 18 is amended to include features of dependent claim 20 and dependent claim 22 is rewritten into independent

form. The other claim amendments are merely for clarity and do not raise any new issues. Entry is thus proper under 37 C.F.R. §1.116.

The Office Action rejects claims 1-9 and 11-23 under 35 U.S.C. §102(e) over U.S. Patent 7,038,977 to Cheong et al. (hereafter Cheong). The Office Action also rejects claim 10 under 35 U.S.C. §103(a) over Cheong in view of U.S. Patent 5,103,344 to Yamamoto. The Office Action further rejects claims 24-27 under 35 U.S.C. §103(a) over Cheong in view of U.S. Patent 5,446,712 to Yamada et al. (hereafter Yamada). The rejections are respectfully traversed with respect to the pending claims.

As discussed during the personal interview, independent claim 1 recites a lens holder and a base having a plurality of first support members, each having a magnet attached thereto, wherein the magnets face each other and each magnet extends in the tracking direction from a first end of the corresponding magnet through a central portion to a second end of the corresponding magnet. Independent claim 1 also recites a driving member having a focusing coil and first and second tracking coils directly attached to the focusing coil in series in the tracking direction in an order of the first tracking coil, the focusing coil and the second tracking coil, a mass center position of the lens holder being substantially coincident with a force center position of the driving member. Still further, independent claim 1 recites that the focusing coil is installed to face the central portion of each of the magnets, the first tracking coil is installed to face the first end of each of the magnets and the second tracking coil is installed to face the second end of each of the magnets.

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Cheong does not teach or suggest at least these features of independent claim 1. More specifically, Cheong does not teach or suggest the respective arrangement of the focusing coil, the first tracking coil and the second tracking coil as recited in independent claim 1. Cheong also does not teach or suggest that the focusing coil and the first and second tracking coils are directly attached to the focusing coil in a series in the tracking direction in an order of the first tracking coil, the focusing coil and the second tracking coil. This argument was discussed during the personal interview. The Office Action states that Cheong's FIG. 6 shows the same configuration as coils in FIG. 11 of the present application. Applicants respectfully disagree. See, for example, the top half of FIG. 12 of the present application as one example of the arrangement of the coils in series. Cheong's FIG. 6 does not teach or suggest the focusing coil and first and second tracking coils attached to the focusing coil in series in the tracking direction in the order as recited in independent claim 1.

Additionally, when discussing the features of previous claim 3, the Office Action (on page 3) merely cites Cheong's focusing coil 134 and two tracking coils 135. However, as is shown in FIGs. 6-8, Cheong does not teach that the focusing coil is installed to face the central portion of each of the magnets, the first tracking coil is installed to face the first end of each of the magnets and the second tracking coil is installed to face the second end of each of the magnets.

Furthermore, Cheong does not teach or suggest that a mass center position of a lens holder is substantially coincident with the force center position of a driving member. The Office Action (on page 9) appears to state that Cheong's col. 2, lines 62-64 teaches the claimed features.

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However, the cited section relates to FIG. 4A of Cheong, which Cheong describes as being a problematic arrangement. Further, the FIG. 4A arrangement is different than the arrangement of the coils that the Office Action relies upon in the rejection of independent claim 1. Cheong's col. 2, lines 60-64 does not correspond to the respective features that the Office Action identifies as corresponding to claim 1. Therefore, the citation to col. 2 is improper.

For at least the reasons as set forth above, Cheong does not teach or suggest all the features of independent claim 1. Thus, independent claim 1 defines patentable subject matter.

Independent claim 11 recites that coils of the magnetic driving unit comprise a focusing coil configured to face a central portion of the plurality of magnets and being horizontally wound in a rectangular shape, and first and second tracking coils configured to face left and right ends of each of the magnets and each tracking coil being directly attached to a corresponding lateral surface of the focusing coil.

For at least similar reasons as set forth above, Cheong does not teach or suggest all the features of independent claim 11. That is, as discussed during the personal interview, Cheong does not suggest the specific arrangement of the tracking coil and the first and second focusing coils. Additionally, Cheong also does not suggest a focusing coil being horizontally wound in a rectangular shape. Thus, independent claim 11 defines patentable subject matter.

Independent claim 14 recites that the coils of the magnetic driving unit comprise a tracking coil vertically wound to have a rectangular type facing a central portion of each of the magnets, and first and second focusing coils facing left and right ends of the magnets and each focusing coil being directly attached to the tracking coil.

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For at least similar reasons as set forth above, Cheong does not teach or suggest all the features of independent claim 14. That is, Cheong does not teach or suggest the specific arrangement of the tracking coil and the first and second focusing coils. Still further, Cheong does not teach or suggest the claimed tracking coil vertically wound to have a rectangular type facing a central portion of each of the magnets as recited in independent claim 14. Thus, independent claim 14 defines patentable subject matter.

Independent claim 18 recites tracking and focusing coils symmetrically installed directly connected to each other in series in a tracking direction in the magnetic field area of the magnets. Independent claim 18 also recites that the coils comprise a focusing coil positioned at a central portion between the magnets and having a horizontally wound surface facing the magnets, and left/right-end tracking coils positioned at left/right ends of each of the magnets and each tracking coil having two vertically wound surfaces facing the magnets.

For at least similar reasons as set forth above, Cheong does not teach or suggest all the features of independent claim 18. That is, Cheong does not teach or suggest the specific arrangement of the focusing coil and the left/right and tracking coils. Additionally, Cheong does not teach or suggest the claimed focusing coil having a horizontally wound surface facing the magnets and the claimed left/right side tracking coils having a vertically wound surface facing the two magnets as recited in independent claim 18. Thus, independent claim 18 defines patentable subject matter.

Independent claim 22 recites tracking and focusing coils symmetrically installed and directly connected to each other in series in the tracking direction in the magnetic field area of

the magnets, wherein the tracking and focusing coils comprise first and second focusing coils disposed at left and right sides of a coil supporter to face left and right ends of the magnets, and a tracking coil disposed vertically on a center of the coil supporter to face a center of the magnets.

For at least similar reasons as set forth above, Cheong does not teach or suggest all the features of independent claim 22. That is, Cheong does not teach or suggest the specific arrangement of the first and second focusing coils and the tracking coil. Cheong also does not suggest a tracking coil disposed vertically on a center of a coil supporter. Thus, independent claim 22 defines patentable subject matter.

For at least the reasons set forth above, each of independent claims 1, 11, 14, 18 and 22 defines patentable subject matter. Each of the dependent claims depends from one of the independent claims and therefore defines patentable subject matter at least for this reason. In addition, the dependent claims recite features that further and independently distinguish over the applied references.

### CONCLUSION

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance. Favorable consideration and prompt allowance of claims 1-2, 4, 7-8, 10-11, 14-19, 21-22 and 24-27 are earnestly solicited. If the Examiner believes that any additional changes would place the application in better condition for allowance, the Examiner is invited to contact the undersigned attorney at the telephone number listed below.

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To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this, concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and please credit any excess fees to such deposit account.

Respectfully submitted,

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